

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

4:05mj173

05-80955

UNITED STATES OF AMERICA,

CRIMINAL NO.

AVERN COHN

Plaintiff,

HON.:

v.

VIO: 21 U.S.C. § 846

21 U.S.C. § 848

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)(ii)(II)

21 U.S.C. § 841(b)(1)(B)(ii)(II)

21 U.S.C. § 843(b)

18 U.S.C. § 1956(h)

D-1 TERRY LEE FLENORY, a.k.a. "T,"
"Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," &
"Terry Williams."

D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech,"
"Rico Seville," "Aundrez Malik Carothers,"
"Ricardo Santos," & "Ronald B. Ivory,"

D-3 NEIL JAMIL BAHURA,

D-4 ARNOLD EDWARD BOYD, JR., a.k.a. "A.R.,"

D-5 ROY CHRISTOPHER BRADDY, a.k.a. "Four," & "Chris,"

D-6 CLEVELAND EDWARD CATO, a.k.a. "Cuzo," &
"Michael Damien Walker,"

D-7 ALVIN DEMMINGS, II,

D-8 BRIAN RONELL GARRETT, a.k.a. "White Boy,"

D-9 JABARI HAYES, a.k.a. "Kenneth Terry Collins,"

D-10 ROBERT SHAWN JAMES, a.k.a. "Wimp,"

D-11 BENJAMIN ANTHONY JOHNSON, a.k.a. "James Lee Belle,"
"Jeff Wilson," "Marcus Page," "Blanko," & "Blank,"

D-12 CHAUNCEY MARCEL JOHNSON, a.k.a. "C Bear,"

D-13 STANLEY LEON LACKEY, JR., a.k.a. "Lucky," & "Demetres Parks,"

D-14 BRUCE ERNEST MARTIN, a.k.a. "Marcus Moore," & "B-Smooth,"

D-15 CHARLES THEODORE PARSON,

D-16 DERRICK KEITH PEGUESE, JR., a.k.a. "Devin Jackson,"

D-17 RENNEL MAURIS PITTS,

D-18 KARREAM HASAN SHEARD, a.k.a. "Hasan Sheard," & "Phillip Woodson,"

D-19 BENJAMIN HENRY SMITH, a.k.a. "Big Ben,"

D-20 CALVIN LEE SPARKS, a.k.a. "Playboy," "Play," & "Mad Ball,"

D-21 CHRISTOPHER DELON TRIPLETT, a.k.a. "Chris Dodson," "Pig Triplett," & "Pig,"

D-22 TONESA LYNETTE WELCH, a.k.a. "Tonessa Mills," & "Toni,"

D-23 GREGORY RAY WEST, a.k.a. "David Blackmon."

D-24 HAROLD STANLEY WILCOX, a.k.a. "June," and
D-25 KIM VERNELL WILLIAMS, a.k.a. "Auntie Kim,"

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A)(ii)(II) -
Conspiracy to Distribute 5 Kilograms or more of Cocaine)

- D-1 TERRY LEE FLENORY, a.k.a. "T,"
"Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," &
"Terry Williams,"
D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech,"
"Rico Seville," "Aundrez Malik Carothers,"
"Ricardo Santos," & "Ronald B. Ivory,"
D-4 ARNOLD EDWARD BOYD, JR., a.k.a. "A.R.,"
D-5 ROY CHRISTOPHER BRADDY, a.k.a. "Four," & "Chris,"
D-6 CLEVELAND EDWARD CATO, a.k.a. "Cuzo," &
"Michael Damien Walker,"
D-7 ALVIN DEMMINGS, II,
D-8 BRIAN RONELL GARRETT, a.k.a. "White Boy,"
D-9 JABARI HAYES, a.k.a. "Kenneth Tony Collins,"
D-10 ROBERT SHAWN JAMES, a.k.a. "Wimp,"
D-11 BENJAMIN ANTHONY JOHNSON, a.k.a. "James Lee Belle,"
"Jeff Wilson," "Marcus Page," "Blanko," & "Blank,"
D-12 CHAUNCEY MARCEL JOHNSON, a.k.a. "C Bear,"
D-13 STANLEY LEON LACKEY, JR., a.k.a. "Lucky," & "Demetres Parks,"
D-14 BRUCE ERNEST MARTIN, a.k.a. "Marcus Moore," & "B-Smooth,"
D-15 CHARLES THEODORE PARSON,
D-16 DERRICK KEITH PEGUESE, JR., a.k.a. "Devin Jackson,"
D-17 RENNEL MAURIS PITTS,
D-18 KARREAM HASAN SHEARD, a.k.a. "Hasan Sheard," & "Phillip Woodson,"
D-19 BENJAMIN HENRY SMITH, a.k.a. "Big Ben,"

D-20 CALVIN LEE SPARKS, a.k.a. "Playboy," "Play," & "Mad Ball,"
D-21 CHRISTOPHER DELON TRIPLETT, a.k.a. "Chris Dodson," "Pig Triplett," & "Pig,"
D-22 TONESA LYNETTE WELCH, a.k.a. "Tonesa Mills," & "Toni,"
D-23 GREGORY RAY WEST, a.k.a. "David Blackmon,"
D-24 HAROLD STANLEY WILCOX, a.k.a. "June," and
D-25 KIM VERNELL WILLIAMS, a.k.a. "Auntie Kim,"

1. From on or about January 1, 1990, said date being approximate, and continuing to the date of this indictment, in the Eastern District of Michigan, and elsewhere. TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown" & "Terry Williams," DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos" & "Ronald B. Ivory," ARNOLD EDWARD BOYD, JR., a.k.a. "A.R.," ROY CHRISTOPHER BRADDY, a.k.a. "Four," & "Chris," CLEVELAND EDWARD CATO, a.k.a. "Cuzo," & "Michael Damien Walker," ALVIN DEMMINGS, II, BRIAN RONELL GARRETT, a.k.a. "White Boy," JABARI HAYES, a.k.a. "Kenneth Torry Collins," ROBERT SHAWN JAMES, a.k.a. "Wimp," BENJAMIN ANTHONY JOHNSON, a.k.a. "James Lee Belle," "Jeff Wilson," "Marcus Page," "Blanko," & "Blank," CHAUNCEY MARCEL JOHNSON, a.k.a. "C Bear," STANLEY LEON LACKEY, JR., a.k.a. "Lucky," & "Demetres Parks," BRUCE ERNEST MARTIN, a.k.a. "Marcus Moore," & "B-Smooth," CHARLES THEODORE PARSON, DERRICK KEITH PEGUESE, JR., a.k.a. "Devin Jackson," RENNEL MAURIS PITTS, KARREAM HASAN SHEARD, a.k.a. "Hasan Sheard," & "Phillip Woodson," BENJAMIN HENRY SMITH, a.k.a. "Big Ben," CALVIN LEE SPARKS, a.k.a. "Playboy," "Play," & "Mad Ball," CHRISTOPHER DELON TRIPLETT, a.k.a. "Chris Dodson," "Pig Triplett," & "Pig," TONESA LYNETTE WELCH, a.k.a. "Tonesa Mills," & "Toni,"

GREGORY RAY WEST, a.k.a. "David Blackmon," HAROLD STANLEY WILCOX, a.k.a. "June," KIM VERNELL WILLIAMS, a.k.a. "Auntie Kim," and others known and unknown to the Grand Jury, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with one another to commit an offense or offenses against the United States, that is, to knowingly or intentionally possess with intent to distribute and to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II).

2. It was a part of the conspiracy that TERRY LEE FLENORY and DEMETRIUS EDWARD FLENORY, by the early 1990's, had established a drug organization which was dealing in kilogram quantities of cocaine in the Detroit metropolitan area. By the mid 1990's, the organization was extended into other areas of the United States including St. Louis, Missouri, Los Angeles, California and Atlanta, Georgia. At various times during the life of the conspiracy, BENJAMIN JOHNSON and ARNOLD EDWARD BOYD, JR. acted as managers over several aspects of the illegal drug operation. Eventually, TERRY LEE FLENORY and DEMETRIUS EDWARD FLENORY began to operate their illegal cocaine business from Atlanta, Georgia and Los Angeles, California as well as Detroit. Between approximately 2001 and 2003, TERRY LEE FLENORY and DEMETRIUS EDWARD FLENORY began to refer to their activities as being part of an entity they called the "Black Mafia Family" (BMF). Over the course of the conspiracy, the organization headed by the FLENORYS bought or sold cocaine in several states including, but not limited to, Kentucky, Georgia, Florida, Missouri, California, Texas and Michigan.

3. It was a further part of the conspiracy that TERRY LEE FLENORY, DEMETRIUS EDWARD FLENORY and others would arrange for large amounts of currency derived from the sale of cocaine in the Detroit metropolitan area and elsewhere to be transported to Texas, California, Georgia and elsewhere for the purpose of purchasing more cocaine.

4. It was a further part of the conspiracy that TERRY LEE FLENORY, DEMETRIUS EDWARD FLENORY, TONESA WELCH and others would use currency derived from the sale of cocaine to purchase or lease luxury automobiles and to acquire real property.

5. It was a further part of the conspiracy that TERRY LEE FLENORY, DEMETRIUS EDWARD FLENORY and others would utilize vehicles equipped with traps and hidden compartments to conceal and transport the cash generated from the drug organization's sale of cocaine. Among the persons who would use those vehicles to transport the cash were BRIAN RONELL GARRETT, JABARI HAYES, STANLEY LEON LACKEY, JR., BRUCE ERNEST MARTIN, DERRICK KEITH PEGEUSE, JR., KARREAM HASSAN SHEARD, GREGORY RAY WEST and KIM VERNELL WILLIAMS.

6. It was a further part of the conspiracy that ARNOLD EDWARD BOYD, JR., ROY CHRISTOPHER BRADY, CLEVELAND EDWARD CATO, ALVIN DEMMINGS, II, JABARI HAYES, ROBERT SHAWN JAMES, BENJAMIN ANTHONY JOHNSON, CHAUNCEY MARCEL JOHNSON, CHARLES THEODORE PARSON, RENNEL MAURIS PITTS, BENJAMIN HENRY SMITH, CALVIN LEE SPARKS, CHRISTOPHER DELON TRIPLETT and HAROLD STANLEY WILCOX would facilitate the conspiracy by, among other activities,

transporting and/or distributing cocaine on behalf of TERRY LEE FLENORY and DEMETRIUS EDWARD FLENORY.

7. At various times during the existence of the conspiracy, police officials seized quantities of cocaine belonging to the drug organization run by TERRY LEE FLENORY and DEMETRIUS EDWARD FLENORY. This cocaine was intended for further distribution by the organization.

These seizures included the following:

- A. On or about May 10, 1999 in Polk County, Texas, police seized approximately 18 kilograms of cocaine.
- B. On or about December 2, 2000 in or near Flagstaff, Arizona, police seized approximately 17 kilograms of cocaine.
- C. On or about February 5, 2001 in Kansas City, Missouri, police seized approximately 9 kilograms of cocaine.
- D. On or about September 15, 2002 in Collin County, Texas, police seized approximately 23 kilograms of cocaine.
- E. On or about August 14, 2003 in Crawford County, Arkansas, police seized approximately 27 kilograms of cocaine.
- F. On or about April 5, 2004 in Florissant, Missouri, police seized approximately 9 kilograms of cocaine.
- G. On or about April 11, 2004 in St. Louis, Missouri, police seized approximately 113.5 kilograms of cocaine.

H. On or about June 16, 2005 in Woodland Hills, California, police seized approximately 250 kilograms of cocaine.

8. At numerous times during the existence of the conspiracy, TERRY LEE FLENORY, DEMETRIUS EDWARD FLENORY and others knowingly and intentionally used a communication facility, specifically, a telephone, in causing or facilitating the commission of the conspiracy to distribute cocaine.

Several of these telephone calls were made by TERRY FLENORY to and from places outside of the Eastern District of Michigan. These calls, include, but are not limited to the following:

<u>Date of Call</u>	<u>Time of Call</u>
August 29, 2004	1:03 p.m.
August 30, 2004	9:03 p.m.
September 2, 2004	10:58 p.m.
September 3, 2004	12:08 a.m.
September 7, 2004	10:24 p.m.
September 8, 2004	10:20 p.m.
September 9, 2004	4:21 p.m.
September 15, 2004	8:29 p.m.

All in violation of Title 21 United States Code, Section 846

COUNT TWO

(Title 21, U.S.C. §§ 848(a) & (c) - Continuing Criminal Enterprise)

D-1 TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," & "Terry Williams"

That in or about the year 1990, said date being approximate, and continuing thereafter up to and including the date of this indictment, in the Eastern District of Michigan, Southern Division, and elsewhere, TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown" & "Terry Williams," defendant herein, did knowingly, intentionally and unlawfully engage in a continuing criminal enterprise in that he unlawfully, willfully, intentionally and knowingly did violate Title 21, United States Code Sections 841(a), 843(b) and 846 on three or more occasions including but not limited to those violations set forth more completely in Count One in general and specifically in paragraphs 7 and 8 of Count One and Counts Four through Nine of this indictment, which counts are hereby adopted and incorporated by reference as if set forth fully. These and other violations were all part of a continuing series of violations of Subchapter I and II of Title 21, United States Code Section 801 et seq., that were undertaken by defendant TERRY LEE FLENORY in concert with at least five or more persons with respect to whom the defendant occupied the position of administrator, organizer, or leader of the enterprise and from which continuing series of violations he received substantial income and resources.

All in violation of Title 21, United States Code Section 848(a) & (c).

COUNT THREE

(Title 21, U.S.C. §§ 848(a) & (c) - Continuing Criminal Enterprise)

D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," & "Ronald B. Ivory,"

That in or about the year 1990, said date being approximate, and continuing thereafter up to and including the date of this indictment, in the Eastern District of Michigan, Southern Division, and elsewhere, DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," & "Ronald B. Ivory," defendant herein, did knowingly, intentionally and unlawfully engage in a continuing criminal enterprise in that he unlawfully, willfully, intentionally and knowingly did violate Title 21, United States Code Sections 841(a), 843(b) and 846 on three or more occasions including but not limited to those violations set forth more completely in Count One in general and specifically in paragraph 7 of Count One. Counts Four through Six and Count Eight of this indictment, which counts are hereby adopted and incorporated by reference as if set forth fully. These and other violations were all part of a continuing series of violations of Subchapter I and II of Title 21, United States Code Section 801 et seq., that were undertaken by defendant DEMETRIUS EDWARD FLENORY in concert with at least five or more persons with respect to whom the defendant occupied the position of administrator, organizer, or leader of the enterprise and from which continuing series of violations he obtained substantial income or resources.

All in violation of Title 21, United States Code Section 848(a) & (c).

COUNT FOUR

(21 U.S.C. §§841(a)(1) & 841(b)(1)(B)(ii)(II) -
Possession With intent to Distribute More Than 500 Grams of Cocaine)

- D-1 TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," & "Terry Williams,"
D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik
Carothers," "Ricardo Santos," & "Ronald B. Ivory,"
D-11 BENJAMIN ANTHONY JOHNSON a.k.a. "James Lee Belle," "Jeff Wilson," "Marcus
Page," "Blanko," & "Blank,"

1. That on or about June 9, 2002, in the Eastern District of Michigan, Southern Division,
TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," & "Terry Williams," DEMETRIUS EDWARD
FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," &
"Ronald B. Ivory," and BENJAMIN ANTHONY JOHNSON, a.k.a. "James Lee Belle," "Jeff
Wilson," "Marcus Page," "Blanko," & "Blank," defendants herein, aiding and abetting each other,
did unlawfully, knowingly and intentionally possess with intent to distribute a mixture or substance
containing in excess of 500 grams of cocaine, a Schedule II Controlled Substance to wit:
approximately 876.9 grams.

All in violation of Title 21, United States Code, Sections 841(a)(1); 841(b)(1)(B)(ii)(II) and
18 United States Code Section 2.

COUNT FIVE

(21 U.S.C. §§841(a)(1) & 841(b)(1)(A)(ii)(II) -
Possession With intent to Distribute More Than 5 Kilograms of Cocaine)

- D-1 TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," & "Terry Williams,"

- D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," & "Ronald B. Ivory."
D-4 ARNOLD EDWARD BOYD, JR., a.k.a. "A.R.,"
D-15 CHARLES THEODORE PARSON

I. That on or about June 18, 2004, in the Eastern District of Michigan, Southern Division, TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown," & "Terry Williams," DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," & "Ronald B. Ivory," and ARNOLD THEODORE BOYD, JR., a.k.a. "A.R.," and CHARLES THEODORE PARSON defendants herein, aiding and abetting each other, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture or substance containing in excess of 5 kilograms of cocaine, a Schedule II Controlled Substance to wit: approximately 9,987 grams.

All in violation of Title 21, United States Code, Sections 841(a)(1); 841(b)(1)(A)(ii)(II) and Title 18 United States Code Section 2.

COUNT SIX

(21 U.S.C. §§841(a)(1) -
Possession With intent to Distribute Cocaine)

- D-1 TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown," & "Terry Williams,"
D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," & "Ronald B. Ivory,"
D-10 ROBERT SHAWN JAMES, a.k.a. "Wimp"

I. That on or about November 12, 2004, in the Eastern District of Michigan, Southern Division, TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville,"

"Terrence Welch," "Terry Lee Brown," & "Terry Williams," DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," & "Ronald B. Ivory," and ROBERT SHAWN JAMES, a.k.a. "Wimp," defendants herein, aiding and abetting each other, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture or substance containing approximately 124 grams of cocaine, a Schedule II Controlled Substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and Title 18 United States Code Section 2.

COUNT SEVEN

(21 U.S.C. Sec. 843(b) -
Use of Communication Facility in Facilitating the Commission of
Violations of the Controlled Substances Act)

D-1 TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown," & "Terry Williams,"

I. That on or about May 28, 2004 at approximately 11:24 a.m., in the Eastern District of Michigan, Southern Division, and elsewhere TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown," & "Terry Williams," defendant herein, knowingly and intentionally used a communication facility, to-wit: a telephone, in causing or facilitating the commission of acts constituting a felony under the Controlled Substances Act, to-wit: conspiracy to distribute cocaine in violation of 21 U.S.C. § 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT EIGHT

**(21 U.S.C. Sec. 843(b) -
Use of Communication Facility in Facilitating the Commission of
Violations of the Controlled Substances Act)**

- D-1 TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," & "Terry Williams,"
D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik
Carothers," "Ricardo Santos," & "Ronald B. Ivory,"

1. That on or about May 29, 2004 at approximately 11:09 p.m., in the Eastern District of Michigan, Southern Division, and elsewhere, TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown," & "Terry Williams," and DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," & "Ronald B. Ivory," defendants herein, knowingly and intentionally used a communication facility, to-wit: a telephone, in causing or facilitating the commission of acts constituting a felony under the Controlled Substances Act, to-wit: conspiracy to distribute cocaine in violation of 21 U.S.C. § 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT NINE

**(21 U.S.C. Sec. 843(b) -
Use of Communication Facility in Facilitating the Commission of
Violations of the Controlled Substances Act)**

- D-1 TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," & "Terry Williams,"
D-15 CHARLES THEODORE PARSON

1. That on or about June 17, 2004 at approximately 2:51 p.m. , in the Eastern District of Michigan, Southern Division, and elsewhere, TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown," & "Terry Williams, and CHARLES THEODORE PARSON, defendants herein, knowingly and intentionally used a communication facility, to-wit: a telephone, in causing or facilitating the commission of acts constituting a felony under the Controlled Substances Act, to-wit: conspiracy to distribute cocaine in violation of 21 U.S.C. § 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TEN

(18 U.S.C. § 1956(a)(1)(A)(i), 1956(a)(1)(B)(i),
1956(a)(1)(B)(ii), and 1956(h) - Conspiracy
to Launder Monetary Instruments

- D-1 TERRY LEE FLENORY, a.k.a. "T,"
"Southwest T," "Paulie," "Randy Jerome Seville,"
"Terrence Welch," "Terry Lee Brown," &
"Terry Williams,"
- D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech,"
"Rico Seville," "Aundrez Malik Carothers,"
"Ricardo Santos," & "Ronald B. Ivory,"
- D-3 NEIL JAMIL BAHURA,
- D-4 ARNOLD EDWARD BOYD, JR., a.k.a. "A.R.,"
- D-5 ROY CHRISTOPHER BRADDY, a.k.a. "Four," & "Chris,"
- D-8 BRIAN RONELL GARRETT, a.k.a. "White Boy,"
- D-9 JABARI HAYES, a.k.a. "Kenneth Torry Collins,"
- D-11 BENJAMIN ANTHONY JOHNSON, a.k.a. "James Lee Belle,"
"Jeff Wilson," "Marcus Page," "Blanko," & "Blank,"
- D-13 STANLEY LEON LACKEY, JR., a.k.a. "Lucky," & "Dometres Parks,"
- D-14 BRUCE ERNEST MARTIN, a.k.a. "Marcus Moore," & "B-Smooth,"
- D-16 DERRICK KEITH PEGUESE, JR., a.k.a. "Devin Jackson,"
- D-18 KARREAM HASAN SHEARD, a.k.a. "Hasan Sheard," & "Phillip Woodson,"
- D-22 TONESA LYNETTE WELCH, a.k.a. "Tonesha Mills," & "Toni,"

D-23 GREGORY RAY WEST, a.k.a. "David Blackmon,"
D-24 HAROLD STANLEY WILCOX, a.k.a. "June,"
D-25 KIM VERNELL WILLIAMS, a.k.a. "Auntie Kim"

1. That in or about January, 1990 and continuing through the date of this indictment, in the Eastern District of Michigan, and elsewhere, TERRY LEE FLENORY, a.k.a. "T," "Southwest T," "Paulie," "Randy Jerome Seville," "Terrence Welch," "Terry Lee Brown," & "Terry Williams," DEMETRIUS EDWARD FLENORY, a.k.a. "Meech," "Rico Seville," "Aundrez Malik Carothers," "Ricardo Santos," & "Ronald B. Ivory," NEIL JAMIL BAHURA, ARNOLD EDWARD BOYD, JR., a.k.a. "A.R.," ROY CHRISTOPHER BRADDY, a.k.a. "Four," & "Chris," BRIAN RONELL GARRETT, a.k.a. "White Boy," JABARI HAYES, a.k.a. "Kenneth Torry Collins," BENJAMIN ANTHONY JOHNSON, a.k.a. "James Lee Belle," "Jeff Wilson," "Marcus Page," "Blanko," & "Blank," STANLEY LEON LACKEY, JR., a.k.a. "Lucky," & "Demetres Parks," BRUCE ERNEST MARTIN, a.k.a. "Marcus Moore," & "B-Smooth," DERRICK KEITH PEGUESE, JR., a.k.a. "Devin Jackson," KARREAM HASAN SHEARD, a.k.a. "Hasan Sheard," & "Phillip Woodson," TONESA LYNETTE WELCH, a.k.a. "Tonesa Mills," & "Toni," GREGORY RAY WEST, a.k.a. "David Blackmon," HAROLD STANLEY WILCOX, a.k.a. "June," and KIM VERNELL WILLIAMS, a.k.a. "Auntie Kim," defendants herein, along with William Charles Marshall, Jr., a.k.a. "Anthony Jordan," "Jamal Washington," "Doc," & "Bi," knowing that the property involved represented the proceeds of some form of unlawful activity, as defined in Title 18, United States Code, Section 1956(c)(1), that is, the distribution of cocaine, a felony under Title 21, United States Code, Section 841(a)(1), did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with each other, and with others, both known and unknown to the

grand jury, to conduct and cause to be conducted financial transactions which involved the proceeds of said unlawful activity, with intent to promote the carrying on of said unlawful activity, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the said unlawful activity and to avoid transaction reporting requirements under federal law; all in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (a)(1)(B)(i), (a)(1)(B)(ii), and (h).

2. It was part of the unlawful conspiracy that TERRY LEE FLENORY and DEMETRIUS EDWARD FLENORY would and did operate a large drug distribution organization which involved the delivery of cocaine to Detroit, Michigan and elsewhere for distribution.

3. It was a further part of the unlawful conspiracy that, at the direction of TERRY LEE FLENORY and DEMETRIUS EDWARD FLENORY, ARNOLD EDWARD BOYD, JR., BRIAN RONELL GARRETT, JABARI JAMIL HAYES, BENJAMIN ANTHONY JOHNSON, STANLEY LEON LACKEY, JR., BRUCE ERNEST MARTIN, DERRICK KEITH PEGUESE, JR., KARREAM HASAN SHEARD, GREGORY RAY WEST, HAROLD STANLEY WILCOX, KIM VERNELL WILLIAMS and others would collect or arrange for the collection of large amounts of currency derived from the sale of cocaine in the metropolitan Detroit area and elsewhere, and then transport or arrange for the transportation of this currency to Texas, California, Georgia and elsewhere for the purpose of purchasing more cocaine, thus promoting the illicit distribution of cocaine.

4. It was a further part of the unlawful conspiracy that the FLENORY organization would utilize vehicles equipped with traps and hidden compartments to conceal and transport the cash generated from the drug organization's sale of cocaine,

5. It was a further part of the unlawful conspiracy that TERRY LEE FLENORY and DEMETRIUS EDWARD FLENORY, KARREAM HASAN SHEARD and other conspirators including William Charles Marshall, Jr., would utilize false names as well as nominee purchasers and lessees to purchase or lease luxury vehicles, to acquire and sell real property and to conduct related financial transactions, while concealing the true source, nature and ownership of the funds involved in these transactions, the source being from the sale of cocaine.

6. It was a further part of the unlawful conspiracy that various conspirators would provide false employment and income information to car dealerships and banking institutions in order to obtain vehicles by purchase or lease or mortgage loans for real property purchases

7. It was a further part of the unlawful conspiracy that various conspirators including TONESA LYNETTE WELCH and William Charles Marshall, Jr, would take large amounts of cash derived from the organization's sale of cocaine and a) deposit the cash into various bank accounts or direct others to make the deposits; b) purchase cashier's checks and money orders or direct others to make such purchases and/or c) wire transfer these funds or direct others to do so. These funds would then be used to purchase assets and pay personal expenses with the goal of concealing the true source, nature and ownership of the funds which had been derived from the sale of cocaine.

8. It was a further part of the unlawful conspiracy that members of the conspiracy would purchase winning four digit State of Michigan lottery tickets from the true winners. Many of these tickets were obtained by NEIL JAMIL BAHURA who in turn sold them to HAROLD STANLEY WILCOX. HAROLD STANLEY WILCOX would pay NEIL JAMIL BAHURA for the lottery tickets with cash obtained from TERRY LEE FLENORY. These winning tickets, which totaled

more than \$1,000,000 would be redeemed with the State of Michigan's lottery bureau by TONESA LYNETTE WELCH, ROY CHRISTOPHER BRADDY and others and monies received would be deposited into various personal bank accounts. The monies would then be used to purchase homes, make mortgage payments, and purchase vehicles in order to conceal the fact that these monies really were derived from the sale of cocaine by the FLENORYS' drug organization.

9. It was a further part of the conspiracy that on or about October 4, 1996, in the Eastern District of Michigan, agents from the United States Customs Service (now known as Immigration and Customs Enforcement), working in an undercover capacity, received approximately \$300,000 in cash which was intended as payment for cocaine purchased by the FLENORYS' organization.

10. It was a further part of the conspiracy that on or about October 16, 1996 in the Eastern District of Michigan, agents from the United States Customs Service (now known as Immigration and Customs Enforcement), working in an undercover capacity, received approximately \$250,000 in cash which was intended as payment for cocaine purchased by the FLENORYS' organization.

11. It was a further part of the conspiracy that on or about October 3, 1997, BRUCE MARTIN possessed and transported approximately \$143,221 in cash which was seized by police in Spalding County, Georgia.

12. It was a further part of the conspiracy that on or about September 14, 1999, BRUCE MARTIN possessed and transported approximately \$425,190 in cash which was seized by police in Beaumont, Texas.

13. It was a further part of the conspiracy that from approximately October, 2001 through December, 2004, TONESA LYNETTE WELCH made mortgage payments with cashier's checks or

money orders totaling more than \$240,000 on a house located at 5435 Ethel, Sherman Oaks, California.

14. It was a further part of the conspiracy that from approximately January, 2001 through August, 2005, TONESA LYNETTE WELCH made monthly lease payments with funds from her personal bank account totaling more than \$600,000 to lease a residence located at 14445 Mulholland Drive, Bel Air, California.

15. It was a further part of the conspiracy that on or about January 31, 2003, KIM VERNELL WILLIAMS, purchased a 2003 GMC Yukon VIN # 3GKFK16Z43G1311940. This vehicle was then transferred to an alias used by BENJAMIN ANTHONY JOHNSON. It would later be used by ARNOLD EDWARD BOYD, JR. as a trade in on a 2003 Chevrolet Express RV.

16. It was a further part of the conspiracy that on or about February 26, 2003, BRIAN RONELL GARRETT and KIM VERNELL WILLIAMS possessed and transported approximately \$723,790 in cash which was seized by police in Gray County, Texas.

17. It was a further part of the conspiracy that on or about March 20, 2003, CLEVELAND CATO purchased a cashier's check with cash in the amount of \$4,800.

18. It was a further part of the conspiracy that on March 20, 2003, CLEVELAND CATO entered into a two year lease agreement relative to 23332 Mission Lane, Farmington Michigan. The owners of the property were paid \$1,000 for the partial month of March and an additional \$9,600 (\$3,200 per month) for the months of April, May, and June.

19. It was a further part of the conspiracy that on or about May 23, 2003 TERRY LEE FLENORY purchased a 2001 Mercedes Benz S500 VIN # WDBNG75J51A136551 using an alias name.

20. It was a further part of the conspiracy that on or about September 25, 2003 TONESA LYNETTE WELCH purchased a 2003 BMW 760LI, VIN # WBAGN83463DK10609.

21. It was a further part of the conspiracy that on or about November 4, 2003, TERRY LEE FLENORY purchased a 2003 Range Rover VIN #SALME11473A118886 using an alias name.

22. It was a further part of the conspiracy that on or about December 11, 2003, ARNOLD EDWARD BOYD, JR. purchased 36027 Beverly, Romulus, Michigan.

23. It was a further part of the conspiracy that on or about December 4, 2003 TERRY LEE FLENORY purchased a 2004 Chevrolet K15, VIN # 3GNFK16Z34G102739 using an alias name.

24. It was a further part of the conspiracy that on or about March 16, 2004 JABARI HAYES possessed and transported approximately \$588,605 in cash which was seized by police in Fenton, Missouri.

25. It was a further part of the conspiracy that on or about June 28, 2004, ARNOLD EDWARD BOYD, JR. purchased a 2003 Chevrolet Express VIN # 1GBFG15T831192236.

26. It was a further part of the conspiracy that on or about July 28, 2004, GREGORY RAY WEST possessed and transported approximately \$199,690 in cash which was seized by police in Atlanta, Georgia. The vehicle in which the money was hidden had been registered in the name of a friend of KARREAM HASAN SHEARD with SHEARD'S active involvement.

27. It was a further part of the conspiracy that on or about December 17, 2004 DEMETRIUS EDWARD FLENORY utilizing a nominee/lessee leased a residence located at ⁹²⁰⁵9250 SW 58 Avenue, Miami, Florida for \$30,000 per month.

28. It was a further part of the conspiracy that on or about January 11, 2005, approximately \$576,000 in cash was seized by police from 16221 Elisa Place, Sherman Oaks, California where TONESA LYNETTE WELCH resided.

29. It was a further part of the conspiracy that on or about January 27, 2005, STANLEY LEON LACKEY, JR. and DERRICK KEITH PEGUESE, JR. possessed and transported approximately \$648,550 in cash which was seized by police in Detroit, Michigan. The vehicle in which the money was hidden had been registered by KARREAM HASAN SHEARD under an alias name.

30. It was a further part of the conspiracy that on or about April 5, 2005, STANLEY LACKEY, JR. possessed and transported approximately \$580,250 in cash which was seized by police in Romulus, Michigan. The vehicle in which the money was hidden had been registered by KARREAM HASAN SHEARD under an alias name.

31. It was a further part of the conspiracy that on or about June 16, 2005, police seized approximately \$1,868,759 from 5550 Oso, Woodland Hills, California, which was possessed by members of the FLENORYS' drug organization.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT ELEVEN

(21 U.S.C. § 853, 18 U.S.C. § 981 (a)(1)(C), 18 U.S.C. § 982 and/or
28 U.S.C. § 2461 - Criminal Forfeiture)

1. The allegations contained in Counts 1-6 and 10 of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853; Title 18, United States Code, Sections 981(a)(1)(C) and 982; and Title 28, United States Code, Section 2461.

2. As a result of the foregoing violations of Title 21, United States Code, Sections 841, 846 and 848 and Title 18, United States Code, Section 1956, as charged in Counts 1-6 and 10 of this Indictment, defendants 1-26, shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations; (b) any property involved in said violations, or any property traceable to such property; and (c) any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

3. **Identified Property Subject to Forfeiture.** Property subject to forfeiture to the United States includes, but is not limited to, the following property:

(a) **REAL PROPERTY**, which is facilitating property, proceeds or property traceable thereto, or property involved in the above-described violations of Title 21, United States Code, Sections 841, 846 and 848 and Title 18, United States Code, Section 1956.

(1) 6086 Belair Lake Road, Lithonia, Georgia, described as:

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 85 of the 16th District of Dekalb County, Georgia and being Lot 1. of Belair Estates

Subdivision, as per plat recorded in Plat Book 100, Page 112, Dekalb County records and revised on June 4, 1997, by Alvin E. Vaughn & Associates, Surveyors, which plat is incorporated herein by reference thereto; being unimproved property known as 6086 Belair Lake Road, according to the present system of numbering houses in Dekalb County, Georgia.
Titled in the name of Tonesia L. Welch.

(2) 1886 S. Beatrice St. Detroit, Michigan, described as:

South 34 feet of Lot 23 and North 9 feet of Lot 24, "Michael Dunn Estate Subdivision", according to the plat thereof as recorded in Liber 57 of Plats, Page 70, Wayne County Records.
Ward: 20 Item No. 12857
Title in the name Roy Braddy.

(3) 47080 Hidden River Circle, Canton, Michigan, described as:

Lot 23 of HIDDEN RIVER ESTATE SUBDIVISION, according to the plat thereof recorded in Liber 116 of Plats, page(s) 45, 46 and 47 of Wayne County Records
Tax Parcel No.: 71-111-05-0023-000.
Titled in the name of Roy Braddy.

(4) 2543 John R, Detroit, Michigan, described as:

Unit #23 Woodward Place at Brush Park II Condominium a condominium according to the Master Deed recorded in Liber 31357, Pages 957 through 1053, inclusive, Wayne County Records, as amended, and designated as Wayne County Condominium Subdivision Plan No. 549, together with rights in Common Elements and Limited Common Elements as set forth in the aforementioned Master Deed and as described in Act 59 of the Public Acts of 1978, as amended, more commonly known as: 2543 John R, Ward No.: 618.023
Titled in the name of Harold Wilcox.

(5) 25114 Coral Gables, Southfield, Michigan, described as:

Lot 13 White Valley Subdivision, according to the Plat thereof as recorded in Liber 61, Page 7 of Plat Oakland County Records.
Tax I.D. No: 24-20-126-008
Titled in the name of Harold Wilcox.

(6) 17607 Edinborough Road, Detroit, Michigan, described as:

Lot 418, Brookline Subdivision No. 2, as recorded in Liber 43 Page 47 of Plats,
Wayne County Records Parcel Identification: Ward: 32 Item: 091124
Commonly known as 17607 Edinborough Road, Detroit, Michigan
Titled in name of Harold Wilcox.

(7) 4409-4411 Second Street, Ecorse, Michigan, described as:

LOT 19, including one half of the vacated alley located at the rear thereof and
adjacent thereto, "LABADIES SUBDIVISION", according to the plat thereof as
recorded in Liber 22 of Place, Page 5, Wayne County Records
c/k/a 4409-4411 2nd Street
Property ID #34-007-11-0019-000.
Titled in the name of Roy Braddy and Randi Boyd.

(8) 36027 Beverly, Romulus, Michigan, described as:

Lots 9 and 10 Grand Park Subdivision as recorded in Liber 14, Page 96, of Plats,
Wayne County Records. Parcel Id.# 80-020-01-0009-300.
Titled in the name of Arnold E. Boyd Jr.

(9) 14445 Mulholland Dr., Los Angeles, California 90077-1733, described as:

TRACT #1000 LOT COM N 69 10' W 226 FT FROM MOST W COR OF LOT 12
TR # 14155 TH N 20 58'15" E TO SW LINE OF SD TR TH NW THEREON TO A
PT SE THEREON 263 FT FROM MOST W COR OF LOT 5 SD TR TH SW TO
NE.
Parcel ID: 2275-029-019.
Titled in the name of Tonessa Welch.

(10) 40530 Deer Creek Unit 42, Canton, Michigan, described as:

Land situated in the Township of Canton, Wayne County, Michigan. Unit 42, DEER
CREEK CONDOMINIUM, a Condominium according to the Master Deed recorded
in Liber 34501, On Pages 1 through 59, both inclusive, Wayne County Records, and
designated as Wayne County Condominium Subdivision Plan No. 620, together with
rights in general common elements and limited common elements, as set forth in the
above described Master Deed and as described in Act 59 of the Public Acts of 1978,
as amended.
Sidwell Number: 71-095-02-0042-000.
Titled in the name of Christine Johnson-Brown.

(b) **VEHICLES**, which are facilitating conveyances or proceeds, or property traceable to, or property involved in the above-described violations of Title 21, United States Code, Sections 841, 846 and 848 and Title 18, United States Code, Section 1956.

- (1) 2000 Lincoln Limousine, VIN: 1L1FM81W3YY860226, in the name of Hasan Sheard;
- (2) 2001 Chevrolet, VIN: 1GCEC19T91E100943, in the name of Stomping Ground Entertainment;
- (3) 2001 Yukon Denali, bearing MI license plate 8EZ-P03, VIN: 1GKFK66U51J178326, in the name of Roy Braddy;
- (4) 2003 BMW 760 LI, VIN: WBAGN83473DK10294, in the name of Inconel Motors Sale & Leasing or Larry Van Steele;
- (5) 2003 Chevrolet Express RV, bearing MI license plate YVS-297, VIN: 1GBFG15T831192236, in the name of Arnold Edward Boyd, Jr.;
- (6) 2003 Lincoln Navigator, VIN: 5LMFU27R63LJ24963, in the name of Philip Woodson;
- (7) 2003 Silver Range Rover, bearing CA license plate 5DUX354, VIN: SALME11473A118886, in the name of Terrence Welch;
- (8) 2004 Chevrolet K15, bearing GA license plate BW-3165, VIN: 3GNFK16Z34G102739, in the name of Terrence Welch;
- (9) 2004 Black Land Rover, bearing MI license plate OFIN59, VIN: SALMF11464A141414, in the name of Gwendolyn Deshawn Brown;
- (10) 2004 Aston-Martin, VIN: SCFAC233X4B501454, in the name of Oracle Motorsports;
- (11) 2004 Bentley GT, VIN: SCBCR63W14C021520, in the name of Inconel Motors Sale & Leasing or Larry Van Steele;

(12) 2004 Black Bentley Continental GT, bearing Florida plate S761C1, VIN: SCBCR63W74C021313, in the name of Larry Van Steele;

(13) 2004 Dodge Ram, bearing MI license plate YYV-293, VIN: 3D7HA16HX4G233720, in the name of Harold Wilcox;

(14) 2004 Marauder, bearing MI license plate YVW-244, VIN: 2MHHM79V04X681039, in the name of Roy Braddy;

(15) 2004 Silver Monte Carlo, bearing MI license plate ZPC408, VIN: 2G1WW12E049100661, in the name of Jacqueline Wilcox;

(16) 2005 Black BMW, bearing CA license plate 5LAK974, VIN: WBAGN83505DK11265, in the name of Inconel Motors Sale & Leasing or Larry Van Steele;

(17) 2005 GMC Sierra Pick-up, MI plate CX25A, VIN: 1GTHK23245F929196, registered to Randall Jones; and

(18) 2004 Black Cadillac Escalade, VIN: 3GYEK62NX4G177856, California registration 5FTU219, registered to William Marshall.

(c) **BANK ACCOUNTS**, which are proceeds or property involved in the above-described violations of Title 21, United States Code, Sections 841, 846 and 848 and Title 18, United States Code, Section 1956.

- (1) Bank of America Account # 04296-08882 in the name of Tonesha L. Welch;
- (2) Bank of America Account # 03970-06376 in the name of Tonesha L. Welch;
- (3) Wells Fargo Bank Account # 505-1138492 in the name of Oracle Motorsports;
- (4) Downriver Community Federal Credit Union Account # 2077259 in the name of Gwendolyn D. Brown;
- (5) Comerica Bank Account # 6816011669 in the name of Harold Wilcox or Tracey A. Stallworth;
- (6) Comerica Bank Account # 6810903960 in the name of Roy Braddy; and

(7) Comerica Bank Account # 9407692632 in the name of Roy Braddy.

(d) **SEIZED CURRENCY**, which are proceeds of the above-described violations of Title 21, United States Code, Sections 841, 846 and 848 and Title 18, United States Code, Section 1956.

(1) Six Hundred Forty Eight Thousand Five Hundred Fifty Dollars (\$648,550) in United States Currency, which was seized on January 27, 2005, as described in paragraph 25 of this Indictment; and

(2) Five Hundred Eighty Thousand Two Hundred Fifty Dollars (\$580,250) in United States Currency, which was seized on April 5, 2005, as described in paragraph 26 of this Indictment. GLO
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5. **Money Judgment.** Such property includes, but is not limited to, \$270,000,000 in United States currency and all traceable interest and proceeds for which the defendants are jointly and severally liable. Such sum in aggregate is property representing the proceeds of the aforementioned offenses, or is traceable to such property, and/or is involved in violations of Title 21, United States Code, Sections 841, 846 and 848 and Title 18, United States Code, Section 1956.

6. **Substitute Assets.** Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), defendants 1 through 26, shall forfeit substitute property, up to the value of the properties described in paragraph 3 above, if, by any act or omission of the defendant, the property described in paragraph 3 cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been

placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

THIS IS A TRUE BILL.

S/GRAND JURY FOREPERSON

STEPHEN J. MURPHY
United States Attorney

s/MICHAEL C. LEIBSON, P24092
Assistant United States Attorney

s/DAWN N. ISON, P43111
Assistant United States Attorney

s/JULIE A. BECK, P53291
Assistant United States Attorney

Date: October ¹⁷ 18, 2005

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 05-CR-80955-DT-02

VS.

HONORABLE AVERN COHN

D-2 DEMETRIUS EDWARD FLENORY, a.k.a. "Meech,"
"Rico Seville," "Aundrez Malik Carothers,"
"Ricardo Santos," & "Ronald B. Ivory,"

Defendant.

DEFENDANT'S ACKNOWLEDGMENT OF INDICTMENT

I, DEMETRIUS FLENORY, defendant in this case, hereby acknowledge that I have received a copy of the indictment before entering my plea, and that I have read it and understand its contents.

I know that if I am convicted or plead guilty, I may be sentenced as follows:

- COUNT ONE - Not less than 10 years or more than Life imprisonment and/or \$4,000,000 fine.
- COUNT THREE- Not less than 20 years and which may be up to Life imprisonment and/or \$2,000,000 fine.
- COUNT FOUR - Not less than 5 years and not more than 40 years imprisonment and/or \$2,000,000 fine.
- COUNT FIVE - Not less than 10 years or more than Life imprisonment and/or \$4,000,000 fine.
- COUNT SIX - Up to 20 years imprisonment and/or \$1,000,000 fine.
- COUNT EIGHT - Up to 4 years imprisonment and/or \$250,000 fine, on each count.

COUNT TEN - A fine of not more than \$500,000 or twice the value of the property involved in the transaction, whichever is greater, or imprisonment for not more than 20 years.

COUNT ELEVEN - Forfeit to the United States any property, real or personal, involved in the offense or any property traceable to such property or that constitutes proceeds or property traceable thereto and or property that facilitated the offense.

DEMETRIUS FLENORY
Defendant

ACKNOWLEDGMENT OF DEFENSE COUNSEL

I acknowledge that I am counsel for defendant and that I have received a copy of the Standing Order for Discovery and Inspection which requires all pre-trial motions to be filed within twenty (20) days of arraignment.

PRINT NAME:
Counsel for Defendant

Dated:

009/2005281

31-OCT-05

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ELL, TX 75019

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